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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL
 CATALDO, JULIAN
 SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,
 Defendant.

SUSMAN GODFREY L.L.P.

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 Shawn J. Rabin (admitted pro hac vice)
 Steven M. Shepard (admitted pro hac vice)
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Case No.: 3:20-cv-04688-RS

**DECLARATION OF MARK MAO IN
 SUPPORT OF PLAINTIFFS'
 OPPOSITION TO GOOGLE'S MOTION
 TO EXCLUDE SUNDAR PICHAI FROM
 TRIAL**

Judge: Hon. Mag. Alex G. Tse
 Date: May 9, 2025
 Time: 2:00 p.m.
 Location: A – 15th Floor

DECLARATION OF MARK MAO

I, Mark Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP (“BSF”), counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs’ Opposition to Google’s Motion to Exclude Sundar Pichai from Testifying at Trial.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00085183.

4. Attached hereto as **Exhibit 2** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00035752.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00164255.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00018661.

7. Attached hereto as **Exhibit 5** is a true and correct copy of relevant excerpts of the transcript from the Deposition of Google employee David Monsees, taken on September 15, 2022.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a document available at <https://www.congress.gov/116/meeting/house/110883/witnesses/HHRG-116-JU05-Bio-PichaiS-20200729.pdf>.

9. Attached hereto as **Exhibit 7** is a true and correct copy of relevant excerpts of the transcript from the Deposition of Francis Ma, taken on October 28, 2022.

10. Attached hereto as **Exhibit 8** is a true and correct copy of relevant excerpts of a document Google produced in discovery labeled GOOG-RDGZ-00056947.

1 11. Attached hereto as **Exhibit 9** is a true and correct copy of a document Google
2 produced in discovery labeled GOOG-RDGZ-00076980.

3 12. Attached hereto as **Exhibit 10** is a true and correct copy of a document Google
4 produced in discovery labeled GOOG-RDGZ-00163898.

5 13. Attached hereto as **Exhibit 11** is a true and correct copy of a document Google
6 produced in discovery labeled GOOG-RDGZ-00057867.

7 14. Attached hereto as **Exhibit 12** is a true and correct copy of relevant excerpts of a
8 document Google produced in discovery labeled GOOG-RDGZ-00060716.

9 15. Attached hereto as **Exhibit 13** is a true and correct copy of a document Google
10 produced in discovery labeled GOOG-RDGZ-00152785.

11 16. Attached hereto as **Exhibit 14** is a true and correct copy of a document Google
12 produced in discovery labeled GOOG-RDGZ-00020740.

13 17. Attached hereto as **Exhibit 15** is a true and correct copy of a document Google
14 produced in discovery labeled GOOG-RDGZ-00116916.

15 18. Attached hereto as **Exhibit 16** is a true and correct copy of a document Google
16 produced in discovery labeled GOOG-RDGZ-00131086.

17 19. Attached hereto as **Exhibit 17** is a true and correct copy of a document Google
18 produced in discovery labeled GOOG-RDGZ-00160904.

19 20. Attached hereto as **Exhibit 18** is a true and correct copy of a document Google
20 produced in discovery labeled GOOG-RDGZ-00145362.

21 21. Attached hereto as **Exhibit 19** is a true and correct copy of a document Google
22 produced in discovery labeled GOOG-RDGZ-00130078.

23 22. Attached hereto as **Exhibit 20** is a true and correct copy of a document Google
24 produced in discovery labeled GOOG-RDGZ-00127151.

25 23. Attached hereto as **Exhibit 21** is a true and correct copy of a document Google
26 produced in discovery labeled GOOG-RDGZ-00038594.

24. Attached hereto as **Exhibit 22** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00171250.

25. Attached hereto as **Exhibit 23** is a true and correct copy of the testimony of Sundar Pichai, given on December 11, 2018.

26. Attached hereto as **Exhibit 24** is a true and correct copy of relevant excerpts of Google's Fourth Supplemental Responses to Plaintiffs' Interrogatories, Set One, dated November 5, 2021.

27. Attached hereto as **Exhibit 25** is a true and correct copy of relevant excerpts of the transcript from the Deposition of Eric Miraglia, taken on October 25, 2022.

28. Attached hereto as **Exhibit 26** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00087672.

29. Attached hereto as **Exhibit 27** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00177701.

30. Attached hereto as **Exhibit 28** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00061531.

31. Attached hereto as **Exhibit 29** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00046121.

32. Attached hereto as **Exhibit 30** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00117801.

33. Attached hereto as **Exhibit 31** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00127803.

34. Attached hereto as **Exhibit 32** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00127840.

35. Attached hereto as **Exhibit 33** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00188868.

36. Attached hereto as **Exhibit 34** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00203483.

37. Attached hereto as **Exhibit 35** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00039515.

38. Attached hereto as **Exhibit 36** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00153597.

39. Attached hereto as **Exhibit 37** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00017489.

40. Attached hereto as **Exhibit 38** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00186761.

41. Attached hereto as **Exhibit 39** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00014597.

42. Attached hereto as **Exhibit 40** is a true and correct copy of a blog available at <https://blog.google/technology/safety-security/keeping-private-information-private/>.

43. Attached hereto as **Exhibit 41** is a true and correct copy of a document available at <https://docs.house.gov/meetings/JU/JU05/20200729/110883/HHRG-116-JU05-Wstate-PichaiS-20200729.pdf>.

44. Attached hereto as **Exhibit 42** is a true and correct copy of relevant excerpts of the transcript from the Deposition of Greg Fair, taken on October 3, 2022.

45. Attached hereto as **Exhibit 43** is a true and correct copy of relevant excerpts of the transcript from the Deposition of Sam Heft-Luthy, taken on February 8, 2023.

46. Attached hereto as **Exhibit 44** is a true and correct copy of a document Google produced in discovery labeled GOOG-RDGZ-00158221.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 17th day of April, 2025, at San Francisco, California.

/s/ *Mark C. Mao*